



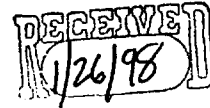
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January 19, 1998

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Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 "C" Street SW
Washington, DC 20204



Section 403(r)(6) Notification

Dear Sir or Madam:

In response to the courtesy letter received on November 19, 1996 from the FDA, suggesting that our previous statement for this product was a drug claim, **LEINER HEALTH PRODUCTS** notifies FDA that it is resubmitting the following restructured statement in accordance with the requirements of section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act:

Potent Antioxidant Protection

Alpha Lipoic Acid is a powerful antioxidant with metabolic activity that can help repower and protect other antioxidants (Vitamin C and Vitamin E) for sustained cell protection.

on the following product:

Your Life® Alpha Lipoic Acid

Very truly yours,

LEINER HEALTH PRODUCTS

Gale Bensussen, President

cc: Michael Bradley, Director of Regulatory Affairs
William Cochran, Regulatory Affairs

975-0162

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